

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

LEONARDO ROMAN-DOMENECH,  
Defendant.

INDICTMENT

CRIMINAL NO. 25-176(RAM)

**VIOLATIONS:**

18 U.S.C. § 2251(a) and (e)  
18 U.S.C. § 2252A(a)(1)  
18 U.S.C. § 2252A(a)(5)(B)

**THREE COUNTS &  
FORFEITURE ALLEGATION**

**THE GRAND JURY CHARGES:**

COUNT ONE

**Sexual Exploitation of Children**

(Title 18, United States Code, Section 2251(a) and (e))

From in or about July 2021 through in or about October 2021, in the District of Puerto

Rico and within the jurisdiction of this court,

**LEONARDO ROMAN-DOMENECH,**

knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce, that is, the defendant, using a cellular phone device, produced images of a 15-year-old female minor engaged in sexually explicit conduct. All in violation of Title 18, United States Code, Sections 2251(a) and (e).



**COUNT TWO****Transportation of Child Exploitation Material**  
(Title 18, United States Code, Section 2252A(a)(1))

From in or about July 2021 through in or about October 2021, in the District of Puerto Rico and within the jurisdiction of this court,

**LEONARDO ROMAN-DOMENECH,**

did knowingly transport, using a means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce, by any means, including by cellular phone device, any child pornography as defined by Title 18, *United States Code*, Section 2256(8)(A). All in violation of Title 18, *United States Code*, Section 2252A(a)(1) and (b)(1).

**COUNT THREE****Possession of Child Exploitation Material**  
(Title 18, United States Code, Section 2252A(a)(5)(B))

From in or about July 2021 through on or about August 27, 2024, in the District of Puerto Rico and within the jurisdiction of this court,

**LEONARDO ROMAN-DOMENECH,**


the defendant herein, knowingly possessed, and accessed with intent to view, any material containing an image of child pornography as defined by Title 18, *United States Code*, Section 2256(8)(A), that has been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce, and was produced using materials which had been mailed, shipped and transported in or affecting interstate and foreign commerce by any means, including by computer, by any means, including by computer, that is: the defendant, using a Samsung mobile device, which has internet capabilities, possessed images of child pornography. All in violation of Title 18, *United States Code*, Section 2252A(a)(5)(B) and (b)(1).


**FORFEITURE ALLEGATION**

The allegations of this Indictment are re-alleged as if fully set forth herein, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

If convicted of the offense set forth above, **LEONARDO ROMAN-DOMENECH**, the defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the possession, receipt, transportation, distribution, or production of child pornography, including but not limited to a Black Samsung SM-S928U1 mobile device, IMEI: 350496870317928. All pursuant to Title 18, United States Code, Section 2253.

W. STEPHEN MULDROW  
United States Attorney

  
Jenifer Y. Hernández-Vega  
Chief, Child Exploitation & Immigration

  
Emelina M. Agrait-Barreto  
Assistant United States Attorney

TRUE BILL.

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Foreperson

Date: April 3, 2025